

1 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

A Limited Liability Partnership

2 Including Professional Corporations

ORI KATZ, Cal. Bar No. 209561

3 GIANNA SEGRETTI, Cal. Bar No. 323645

KORAY ERBASI, Cal. Bar No. 332877

4 Four Embarcadero Center, 17th Floor

San Francisco, California 94111-4109

5 Telephone: 415.434.9100

Facsimile: 415.434.3947

6 Email okatz@sheppardmullin.com

gsegretti@sheppardmullin.com

7 kerbasi@sheppardmullin.com

8 Attorneys for ICTSI Oregon, Inc.

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10 **UNITED STATES BANKRUPTCY COURT**

11 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

12 In re

13 INTERNATIONAL LONGSHORE AND
14 WAREHOUSE UNION,

15 Debtor.

Case No. 23-30662 HLB

Chapter 11

**ICTSI OREGON, INC.'S STATEMENT
REGARDING STATUS CONFERENCE
HEARING ON JANUARY 18, 2024**

Status Conference Hearing

Date: January 18, 2024

Time: 10:00 a.m. (Pacific Time)

Judge: Hon. Hannah L. Blumenstiel

Place: Zoom.Gov

1 **STATEMENT**

2 ICTSI Oregon, Inc. ("ICTSI"), as creditor in the above-captioned chapter 11 case of
3 International Longshore and Warehouse Union (the "Debtor"), files this Statement to apprise the
4 Court of recent developments in this case in advance of the status conference hearing scheduled for
5 January 18, 2024 (the "Status Conference").

6 **A. Mediation.**

7 ICTSI, the Debtor, ILWU Coast Longshore Division ("CLD"), and Pacific Longshoremen's
8 Memorial Association ("PLMA") participated in two full days of in-person mediation in San
9 Francisco on January 5 and January 8 before the Honorable Judge Neil W. Bason. The parties have
10 scheduled a third mediation session for January 12, which will take place via remote
11 videoconference.

12 **B. Motion to Compel.**

13 On January 2, 2024, ICTSI filed a motion [Docket No. 136] (the "Motion to Compel")
14 seeking the entry of an order: (a) compelling the Debtor to produce non-privileged financial
15 documents responsive to ICTSI's RFP No. 67, including the Debtor's QuickBooks accounting
16 records, general ledger, and bank reconciliations, in native format; and (b) compelling the Debtor to
17 produce a privilege log.

18 ICTSI did not set the Motion to Compel for hearing because, in the course of discussing a
19 convenient date for a hearing, the Debtor agreed to produce additional financial documents in
20 response to ICTSI's RFP No. 67, as well as a privilege log. ICTSI is in the process of reviewing
21 the newly produced documents and anticipates such production will resolve the Motion to Compel.

22 **C. Discovery Served on ICTSI.**

23 The Debtor served discovery on ICTSI. Because the Debtor was already in possession of
24 the non-objectionable documents requested, ICTSI did not have any additional documents to
25 produce, and relatedly explained to the Debtor why a privilege log was unnecessary.
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28

1 Dated: January 11, 2024

2 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

3
4 By

/s/ Ori Katz

ORI KATZ

GIANNA SEGRETTI

KORAY ERBASI

7 *Attorneys for ICTSI Oregon, Inc.*

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CERTIFICATE OF SERVICE

I hereby certify that on January 11, 2024, I served by electronic mail a true and accurate copy of the foregoing to all counsel of record.

/s/ Ori Katz
ORI KATZ